



HOME ARP ALLOCATION PLAN

DRAFT

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Consultation

Describe the consultation process including methods used and dates of consultation:

See Appendix A for all Stakeholder Consultation materials, including outreach materials, meeting invitees, meeting attendees and a participant comments. Stakeholder comments received throughout these various sessions and individual meetings are summarized below, in the Appendix, and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

Knox County engaged in an extensive stakeholder consultation process during January and February 2023. During this time, the County conducted one-on-one conversations with a variety of shelter and service providers serving each of the qualifying populations; the Continuum of Care; victim service providers; the Knoxville Community Development Corporation (which serves as the PHA for the County); and organizations addressing fair housing and Civil Rights in the County. In addition, the County conducted four focus group sessions, comprising of the same stakeholders.

Each of the focus group sessions focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

As part of the County’s work to prepare the Report on Homelessness, issued in December 2022, the county also conducted a survey of people with lived experience, the responses of which were utilized in the preparation of this Allocation Plan. The County also met with the Youth Action Board, a group led by youth that is experiencing or has experienced homelessness.

List the organizations consulted:

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Type of Agency(ies)/Org
Knox Area Rescue Ministries	January 26, 2023	One-on-One interview	Homeless service providers serving homeless, at-risk of homeless, Other at-risk
Angelic Ministries	January 30, 2023	One-on-One interview	Homeless service providers serving all four QPs

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Type of Agency(ies)/Org
Connect Ministries	January 31, 2023	One-on-One interview	Homeless service providers serving the homeless, at-risk of homelessness, other at-risk
KnoxHMIS	February 1, 2023	One-on-One interview	CoC
Emergency Shelter Providers	February 1, 2023	Focus Group	Homeless service providers serving all four QPs
Homeless/Supportive Service Providers	February 1, 2023	Focus Group	Homeless service providers serving all four QPs
Fair Housing/Civil Rights/Disability Advocates	February 2, 2023	Focus Group	Homeless service providers serving homeless, at-risk of homeless, victims of trafficking
Public Agencies/Health & Human Service Providers	February 2, 2023	Focus Group	Homeless service providers serving victims of human trafficking
Knoxville/Knox County CAC	February 2, 2023	One-on-One interview	Homeless service providers serving all four QPs; Public or Private Agencies addressing the needs of people with disabilities
Volunteers of America (SSVF Provider)	February 6, 2023	One-on-One interview	Homeless service providers serving homeless, at-risk of homeless, Other at-risk; Veterans groups
Youth Action Board	February 6, 2023	Group interview	Homeless service providers serving all four QPs
The Lost Vets Rescue	February 10, 2023	One-on-One interview	Homeless service providers serving homeless, at-risk of

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Type of Agency(ies)/Org
			homeless, Other at-risk; Veterans groups
KCDC	February 7, 2023	One-on-one-Interview	PHA
Centro Hispano East TN	February 22, 2023	One-on-one interview	Homeless service providers serving all four QPs
McNabb	January 23, 2023	One-on-one Interview	Homeless service providers serving all four QPs

Summarize feedback received and results of upfront consultation with these entities:

Continuum of Care/HMIS

- The largest gap is a lack of Affordable Housing.
- Case Management is also a need to assist households identify housing opportunities. Housing stabilization, prevention and/or diversion services would be helpful to avoid households reaching the shelter door or an unsheltered situation.
- Housing for individuals is most in demand.
- While the need is smaller, the inventory for a 4-6 person household is extremely limited as "the bulk of units are for individuals."
- HMIS data shows increase in domestic violence, particularly among female-headed households
- Escalating rental costs have increased instability in housing.
- Single adults often aren't targeted for dedicated services as they are not viewed as a subpopulation. As such, their time to being housed is longer than other subpopulations.

Shelter Providers

- Housing stability is critical to housing success; funding for stability services and financial assistance (such as rental and utility arrears) is not widely available
- Single dads are an underserved population; adult men not targeted by many programs, so they have more difficult time accessing housing and services
- Affordable, accessible housing is not widely available in the County
- Financial literacy services as well as housekeeping assistance are services that could help maintain stability once housed
- Childcare services remain a significant gap
- There would be significant benefit for the community to have non-congregate shelters that are owned and operated by a shelter provider rather than using hotel vouchers to provide this type of NCS; however they are more expensive to develop than congregate shelter settings. VMC is looking for a partner to build a site on their property.
- KARM noted a significant need for more permanent supportive housing to ensure that persons placed in rapid rehousing that need a higher level of services can instead be placed in PSH.

- Increased shelter bed capacity is a need, particularly for families with children. Vulnerable seniors and youth experiencing homelessness.
- There are significant challenges with families needing shelter space and difficulty providing services to families in shelter, including inability to provide childcare so parents can receive necessary recovery services while in shelter
- Services targeted to diversion and families were identified as needs
- There is a lack of transitional housing.

Service Providers

- There continues to be a large gap in the number of quality affordable and accessible units available for rent in the County. There is an insufficient number of landlords willing to accept HCV
- A centralizing agency or space that could review services provided to minimize duplication of services is a need
- Services and resources in low-capacity and/or rural areas are needed
- Case management, financial literacy, housekeeping/life skills, transportation, affordable childcare, mental health, primary healthcare, addiction/recovery supports are the top identified services that are needed
- One and two bedroom units are the most in demand.
- Veterans and single mothers were identified as subpopulations having unmet needs and being underserved in the system
- Service availability during “off hours” nights, weekends is limited and forces consumers to take unpaid time to access services (this is true for all public benefits)
- The Hispanic population is underserved due to LEP, lack of knowledge/communication of services that are available for this population. There are insufficient bilingual case workers that can effectively communicate with LEP persons.
- There is a need for unique supportive housing for seniors that can support assisted living.
- Youth-specific housing is a gap in services available.
- Many landlords do not currently accept Section 8 and other vouchers; incentives to encourage participation could be effective, but there are none currently available.
- Mobile mental health services coupled with Street Outreach Services are a gap in services
- Longer term services beyond when housing assistance expires are needed. Many funds are only available for short term services, but consumers need longer term intervention in order to stabilize and maintain housing. PSH, particularly low-barrier PSH, is needed for more than just chronically homeless populations.
- Barriers to accessing housing include poor rental history, criminal history. Sex offenders, and re-entry population with felony convictions are difficult to house.
- There is a silo effect between agencies. Many agencies operate independently and have limited cooperation. A central site where information can be provided to the community and between agencies would be ideal.
- Individuals in rural areas lack information about and access to services-to access services in rural areas, people have seek information. Service providers in the city often make referrals.
- There are limited resources available for refugees, many require LEP services that are not widely available; Other needed services include transportation, rental assistance plus utilities,

childcare, mental health counseling. These are services needed for all households experiencing homelessness, but cultural and language barriers exacerbate challenges that arise from lack of these services. Recent immigrants in particular are unable to secure resources for security deposit and initial costs of identifying and securing housing; many have no credit history which is a barrier to accessing housing.

- Where are victims being trafficked is generally where the affordable units are, which makes it difficult to locate a victim/survivor in those units because it doesn't break the cycle of trafficking.

Youth Action Board/PLE

- Affordable housing, transportation and general services targeted specifically for youth are identified as a gap
- Youth reported that there aren't enough affordable housing units, RSH units, or PSH units in the community. Additionally, many units will not take individuals with poor credit scores (which is common for youth).
- Persons of color are disproportionately impacted by legal history, particularly for non-violent crimes, which can impact their ability to access available housing.
- lack of transportation impacts ability to apply for resources, maintain employment and utilize childcare. Public transportation can take all day to transport to destination, and if the destination is a public benefit, many times transportation arrives after hours
- peer support mentorship program would be significantly beneficial in helping individuals recognize their needs (such as being victims of DV), navigating community resources, and surviving on the streets. Youth-specific resources are not available and this impacts youth willingness to access and utilize resources
- There is a significant gap in available resources to help DV victims and many youth that participated indicated that many DV victims are unaware they are in a DV situation until later. Additionally, participants noted that it could be difficult to obtain support as many government programs require the individual to attempt to obtain child support from the abuser. Participants noted that they had avoided applying or were rejected for government programs because they did not want to try to reach out as it would let their previous abuser know their whereabouts.
- Parenting needs, particularly for youth experiencing homelessness, are currently underserved by the system. Additional supports need to be made available.
- Regarding housing, participants noted parenting youth often have difficulty accessing housing as they cannot live with their partners if they are not married, leading to many individuals "living in their car or doubling up" instead of utilizing the available options provided by service providers. Similar concerns were expressed about being able to bring pets into housing.
- Increased services targeted to POC are needed, or more outreach to make service availability known

Civil Rights

- Youth Action Board indicated LGBGQI and POC individuals communities often face discrimination or prejudice when attempting to access services, despite these populations being over-represented in the homeless population.

- YAB participants noted that the level of services provided varies significantly by area of town. Areas such as the East Side, with a significantly higher minority population, have fewer available services.

Veterans

- There is a significant need for veteran-specific housing in a variety of configurations, such as PSH and RRH with both single and multiple-unit rooms.
- current services provided by the agency are adequate to meet the population's needs but are concerned about the significant increase in the number of persons becoming homeless.
- Fastest growing subpopulation served by Lost Vets Rescue among homeless Veterans are women with children
- There is significant need for more mental health services, particularly inpatient services
- Housing resources for homeless Veterans are needed, including assistance with housing search and placement, security/utility deposits, utility bills
- Veteran shelter is typically in hotels
- Increases in housing costs have made it difficult to place Veterans in permanent housing, as well as put these households at risk due to increases in rent costs
- Housing stabilization services, including case management, rental assistance, for Veterans are a need and not available through the VA
- Current shelters are not equipped to address the needs of Veterans or any individuals experiencing trauma or PTSD.
- Veteran families often face difficulty finding 2-3BR units

Public Housing Authorities

- There aren't enough units to rent on the market as it is, and many landlords do not currently accept Section 8 and other vouchers due to favorable market conditions; incentives to encourage participation could be effective.
- KCDC (PHA) was awarded funds for the "Moving to Work" program, which can offer Landlord Incentives. KCDC is currently in the planning phase, but funds may allow up to 200% FMR or payment standards in some higher cost areas in order to allow KCDC to offer payment standards that are closer to market rates.
- Vouchers are returned frequently due to insufficient inventory and landlords willing to participate; households that return their voucher are dropped to the bottom of the waiting list and spend significantly more time waiting for housing.
- Regardless of preferences, there is a deficit of units. Waiting list times vary based on preference and can range from one month to five years.
- Mental Health counseling on-site would be useful
- Housekeeping services or general life skills would be helpful for tenants to maintain their unit
- Elderly subpopulation could benefit from additional supportive services as they age in place/transition to Medicaid beds.
- KCDC is currently working on developing 32 housing units for Veterans; hopeful that VA representative will be on site to further promote stability.
- LEP is a challenge-application materials and other resources are made available in some languages, but there are other languages that are underserved

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 3/3/2023***
- ***Public comment period: start date – 3/10/2023 end date – 3/24/2023***
- ***Date(s) of public hearing: 3/21/2023***

Describe the public participation process:

Knox County published a notice informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on March 3, 2023. A copy of the notice and Plan were also made available on the County's Website. The Plan was available for a 15-day period, and the County conducted a public hearing on March 21, 2023. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

Describe efforts to broaden public participation:

Knox County offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing either in person or virtually were made available.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

TBD after public comment period.

Summarize any comments or recommendations not accepted and state the reasons why:

TBD after public comment period.

Needs Assessment and Gaps Analysis

Like many communities, Knox County, TN is facing increases in homelessness and lacks a sufficient inventory of affordable housing to meet the need. Rapid rehousing and permanent supportive programs are at capacity, and emergency shelters are full, with increasing lengths of stay. In 2021 the length of stay in emergency shelter was almost three months, which could indicate a need for additional shelter beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelters, transitional housing, and other housing facilities.

Homeless Needs Inventory and Gap Analysis Table for Knox County

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	644		644	-	-								
Transitional Housing	268		268	-	45								
Permanent Supportive Housing	610		610	-	142								
Other Permanent Housing	44		44	-	#								
Sheltered Homeless						73	546	55					
Unsheltered Homeless						2	363	12*					
Current Gap										Narrated throughout			

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

* Unsheltered counts were not required in 2021 or 2022

The County also has a need for affordable housing. The shortage of units both affordable and available for renter households at or below 30% area median income (AMI) increases housing insecurity and rent pressure on extremely low-income households. Further, the Homelessness in Knox County Report and Recommendations released in December 2022 by the Grant and Community Development Department cites a lack of affordable housing as the number one reason individuals become homeless. As rent prices continue to increase, while incomes remain stagnant (or in many cases have decreased), demand for affordable units far exceeds supply. The table below describes the housing inventory in Knox County utilizing CHAS data, the most current dataset being 2015-2019. Though this data is now dated and does not include impacts of the pandemic, it can reasonably be assumed that the challenges have only been exacerbated by the pandemic.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
KNOX COUNTY, TN	# of Units	# of Households	# of Households
Total Rental Units	71,150		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	14,545		
Rental Units Affordable to HH at 50% AMI (Other Populations)	21,355		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		12,855	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,785	
Current Gaps			17,825

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

The CoC includes the City of Knoxville, which is its own HOME PJ. The figures included in this section include both Knox County and Knoxville. Where data can be isolated to Knox County (minus Knoxville), this is noted.

Homeless as defined in 24 CFR 91.5

The number of Knox County residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted by the Knox County Continuum of Care (CoC) on February 23, 2022. The PIT Count identified a total of 1,178 persons experiencing homelessness in 2022, up from 786 persons (+49.9%) identified in 2021. Of the counted homeless individuals 805 (68.3%) were sheltered and 373 (31.7%) were unsheltered.

Per HMIS data for calendar year 2021, there were 13,252 individuals accessing programs and systems.

Program	Persons Served
Coordinated Entry	1,977
Emergency Shelter	5,540
Homelessness Prevention	156
Permanent Supportive Housing and Supportive Housing	398
Rapid Re-Housing	1,495
Supportive Services	1,760
Street Outreach	1,487
Transitional Housing	439
Total	13,252

Of those, 10,096 (76.2%) were adults and 3,141 were children (23.7%). Furthermore, 56% of the adults were male and 44.1% were female. Additionally, 58% (7,682) of the individuals were White, 19.8% (2,617) were Black/African American, and 4.1% (541) There were Hispanic/Latino. Per the American Community Survey 2016-2020 5-year estimates the population of Knox County was 395,210 and 84.8% were White, 8.6% were Black/African American, and 4.4% were Hispanic/Latino. This indicates that Black/African American individuals are disproportionately disadvantaged.

During the same time period, 7,247 chronically homeless households accessed the various programs and systems in Knox County. At the end of 2021, only 1,817 households exited the homeless system to positive destinations. This suggests a need for more housing options.

According to the Knox County Report on Homelessness, between July and September 2022 2,359 individuals were identified as being literally homeless. According to the FY2021 Performance Measurement Module, 2,164 individuals experienced homelessness for the first time. This is a 4.7% increase from 2020, when 2,066 persons entering the continuum experienced homelessness for the first time. These measures took into account persons entering emergency shelter, transitional housing, and safe haven programs. In total, there were 2,306 individuals who experienced homelessness, which was up 15% from 2020, but the average length of stay did decrease slightly by three days, from 89 in 2020 to 86 in 2021.

Participants in the consultation process revealed increases among homeless Veteran women with children.

At Risk of Homelessness as defined in 24 CFR 91.5

Based on HMIS data for the calendar year January 1, 2021-December 31, 2021, the CoC served 156 individuals across eight homeless prevention programs. Of those served, 98 exited the program; 49 leavers exited without ongoing income and 26 exited without an ongoing subsidy, putting them at risk of returning to homelessness.

According to 2015-2019 CHAS data, in Knox County there are 71,150 rental units of which only 14,545 are affordable to households making 30% area median income (AMI). Households earning between 0-30% area median income total 18,460. Factoring in that only 51.2% of the affordable units are housing those with the appropriate income, the gap (the number of housing units needed) for those earning 30% AMI or less is 10,970 units.

According to the Knox County Report on Homelessness, between July and September 2022 there were 1,056 individuals identified as at risk for homelessness. Based on HMIS data for the calendar year January 1, 2021-December 31, 2021, 22.7% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate greater risk of returning to the homeless system.

In addition, Knox County assisted 6,818 households with the Emergency Rental Assistance Program since inception through March 2022. Of these households, 70% had income at or below 30% AMI. Similarly, 7,815 households received LIHEAP assistance during calendar year 2021. Of those assisted, 3,528 (45.1%) were renter households. The majority of those assisted, 5,908 (75.6%), had incomes below 30% AMI. There were 676 (8.7%) that had no income and 819 (10.5%) that had income from employment only. Another 1,474 (18.9%) had incomes between 30-50% AMI. Additionally, 2,227 of those households

were headed by single parents. Of those, 2,115 (95%) were headed by women. Households requiring assistance with rent and/or utility payments may be at greater risk of experiencing homelessness if they cannot sustain ongoing payments.

Per the FY2021 System Performance Measurement Module, 2,561 unduplicated individuals were served in Emergency Shelter, Safe Haven, Transitional Housing, and Permanent Supportive Housing. Combined with those who have accessed the system and services before, the total served was 3,622. Of the 3,622 served, 2,219 exited the system. Of those who exited, only 1,225 (55%) exited the programs to permanent housing destinations. This indicates a large portion still relying on the homeless system and programs and puts those who did not establish stable housing at great risk of returning to homelessness.

Knoxville Community Development Corporation (KCDC), the PHA serving Knox County, indicated there are approximately 10,000 households on the Housing Choice Voucher (HCV) waiting list, indicating a large population in need of affordable housing. KCDC indicated that it can take up to five years for a household to make it to the top of the waiting list, depending on preferences, attrition and unit availability. Regardless of preferences, however, there is still a deficiency in the number of units, particularly as landlords decline to participate in the program, or as participating landlords sell their units to owners unwilling to participate.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Per HMIS data for the period January 1-December 31, 2021, 2,332 (17.6%) individuals had a history of domestic violence and 753 (5.7%) were actively fleeing domestic violence. Of those with a history of domestic violence, 84.4% were households of only adults and 17.4% were households with adults and children. There were two children only households with a history of domestic violence. Additionally, of the 753 who were fleeing domestic violence, 72.5% were adult only households and 27.2% were households with adults and children. There was one child only household actively fleeing domestic violence. During the consultation process, KnoxHMIS reported an increase in domestic violence, particularly among female-headed households.

The McNabb Center, which provides mental health, substance use, social and victim services in the East Tennessee region, provided domestic violence services to 334 individuals in calendar year 2021. In addition to outreach and counseling services for victims of domestic violence and sexual assault, the Center offers a safe emergency shelter and transitional housing for individuals in need.

The Community Coalition Against Human Trafficking (CCAHT) indicated that their hotline had received 176 distinct reports/referrals of human trafficking in Knox County. CCAHT noted that in the 33-county region they serve, 407 reports were received. This is notable in that Individuals often get trafficked between counties. CCAHT believes the actual victimization rate in the region may be closer to 3,000.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Those at greatest risk of housing instability include 10,245 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents 15.3% of all renter households in the County. In addition, 2,515 renter households earn 30%-50% AMI and pay more than 50% of their income on housing.

During the period January 1, 2021-December 31, 2021, 1,292 households exited the homeless system to temporary destinations, which is 22.7% of all households who exited. Households receiving temporary assistance are more likely to return to homelessness or face greater risk of housing instability than those exiting to permanent destinations. Furthermore, 470 households, or 8.3% of all exits, exited to places not meant for human habitation which signals immediate returns to homelessness, indicating a need for ongoing services/assistance to prevent these returns. Consultation with KnoxHMIS staff indicated that the two-year rate of return for the COC in 2021 was 15%, which is on par with the rate of return to homelessness nationwide (14%). KnoxHMIS also indicated that the six-month and twelve-month rates of return to homelessness in the Coc were 6% and 10%, respectively, noting that this is based on individuals that reenter the HMIS system and doesn't represent households that experience returns to homelessness that do not re-engage with services or shelter.

During the same time period, there were 571 adults/heads of households that exited temporary rapid rehousing programs. Of these, 187, or 32.75%, exited with zero income. Households without a source of income to pay ongoing rent payments may be at greater risk of returning to homelessness. As mentioned above, about half of the individuals that exited programs designed to prevent homelessness exited without income; over a quarter of those that exited did so without an ongoing subsidy.

Per the HMIS, 1,290 youth households accessed the system and services. This makes up 9.7% of all households. Veterans who accessed the system and services made up 6.6% with 867 households assessed.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Knoxville Community Development Corporation (KCDC) administers several Section 8 housing programs that provide housing assistance to low-income families in the private rental market, including the Housing Choice Voucher Program, which includes Veteran Affairs Supportive Housing (VASH). There are currently about 3,600 HCVs available in the County.

The 2022 HIC, Knox County has 610 Permanent Supportive Housing beds and 44 Other Permanent Supportive Housing (OPH) beds, of which most are estimated to be occupied. The County also has 644 emergency shelter beds and 268 transitional housing beds.

Knox County's allocation of funding in response to homelessness has increased significantly in the last two years. The County oversees the U.S. Department of Treasury's Emergency Rental Assistance (ERA) Program and has provided over \$54 million in rent and utility assistance to city and county residents since the inception of the program in early 2021. In addition to the remaining ERA program funds, over \$2.8 million has been allocated in local and federal funds for the prevention and response to homelessness in fiscal year 2023 including providing funds for street outreach services, rental assistance, and health services.

Volunteers of America indicated that they provide housing case management services to assist a veteran in housing placement (including assistance with deposits and the first three months' rent), additional

assistance to pay a portion of rent for up to 24 months, assistance paying for car repairs, and case management for their clients. The Lost Vets Rescue provides 24 hour emergency services for Veterans in crisis.

Supportive services offered by Bridge Refugee Services include interpretation, language, transportation, employment services, cultural orientation for refugees.

Due to expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in Knox County experienced significant strains. Despite additional funding during the pandemic, there is still insufficient capacity across all systems to address all unmet needs of all qualifying populations. This includes staff capacity, inventory capacity and resource capacity to appropriately address growing needs among all of the QPs. Service providers and shelters alike experience ongoing staffing shortages that contribute to these capacity challenges, but also the housing market and inventory is rapidly changing.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

According to the Knox County Report on Homelessness, released in late 2022, the top five causes of homelessness in Knox County are a lack of affordable housing, eviction, job loss/underemployment, substance misuse, and mental health. The number of unhoused individuals and families living in the City and County has been growing rapidly. There has been substantial growth in the number of homeless camps located in unincorporated areas of the County. This trend continues one that emerged during the preparation of the County's 2020-2024 Consolidated Plan, where stakeholders including the School District(s) and County Library and Parks and Recreation Departments reported an increase in rural homelessness. Furthermore, homeless service providers have reported an unprecedented number of people seeking emergency shelter over the past year. Families with children are living in their cars, emergency shelter beds for seniors are full, and an increasing number of individuals with severe mental illness or uncontrolled substance misuse disorders are living on the street due to the unavailability of shelter beds and lack of affordable inventory.

Per the HMIS in 2021, 7,247 households of the 10,766 that accessed the system were chronically homeless. As 67.3% of the households have a chronic issue, it suggests a great need for more housing options.

HMIS indicated 5,686 individuals served by the homeless systems and services during the period of January 1, 2021-December 31, 2021. According to the 2022 HIC, Knox County has 610 Permanent Supportive Housing beds and 44 Other Permanent Supportive Housing (OPH) beds. The County also has 644 emergency shelter beds, 268 transitional housing beds. At the time of the February 2022 PIT count, the bed utilization rate was 91.3%. Still, the available inventory is insufficient to meet the needs of the population experiencing homelessness, especially as this population continues to grow in the County. The HIC also showed some organizations were over capacity, while some were under. This may indicate a need for more outreach efforts and service support to keep each facility/unit at an efficient and manageable capacity.

There continues to be a large gap in the number of quality affordable and accessible units available for rent in the County. Many landlords do not currently accept Section 8 and other vouchers; incentives to encourage participation could be effective. Rents have escalated leading to an increase in evictions.

Shelter providers consulted during the preparation of this plan indicated that single dads are an underserved population seeking shelter and services. Families in need of shelter are also often unable to identify sufficient shelter space, and shelters are often unable to provide services needed for families while in shelter (childcare while parents receive mental health, substances misuse treatment, job search, education, etc.). Parenting youth were also identified as a subpopulation that experiences difficulty in identifying shelter and housing resources.

Housing search and placement services, mobile mental health services coupled with street outreach services, case management, financial literacy, housekeeping/life skills, transportation, affordable childcare, mental health, primary healthcare, addiction/recovery supports are the top identified services that are needed and not widely available.

Stakeholders reported there are limited resources available for refugees; many require LEP services that are not widely available. Other needed services include transportation, rental assistance plus utilities, childcare, mental health counseling. These are services needed for all households experiencing homelessness, but cultural and language barriers exacerbate challenges that arise from lack of these services.

At Risk of Homelessness as defined in 24 CFR 91.5

During the preparation of the Knox County Report on Homelessness, the County interviewed persons with lived experience. The stories collected through this effort offer insight into service needs and gaps that lead to an individual or household's homelessness. Loss of income resulting in an inability to pay for housing was a consistent factor. Especially for extremely low-income households, one crisis can result in homelessness and start an ongoing cycle housing instability. What's more, poor rental history is often identified as a barrier for households accessing affordable housing. Availability of sufficient inventory of affordable housing, coupled with resources for rental assistance and legal services for eviction prevention may help salvage tenancies and prevent poor rental history from becoming a barrier for future tenancies. Coupling this assistance with services to ensure sufficiency and stability has proven to be a successful model, as forcing a household into homelessness in order to assist the household has proven costly and inefficient for providers in the County.

Supportive services designed to assist households at risk of homelessness and/or housing instability are also required. Some individuals interviewed for the report identified system navigation challenges such as difficulty applying for unemployment and workman's compensation, accessing health services and applying for housing. Stakeholders consulted during the preparation of this Plan also identified housing stabilization, prevention and diversion resources and services as necessary and unavailable in the County. Longer term services beyond when housing assistance expires are needed. Many funds are only available for short term services, but consumers need longer term intervention in order to stabilize and maintain housing. PSH, particularly low-barrier PSH, is needed for more than just chronically homeless populations, as reported by stakeholders.

Mental health and substance misuse also increase the likelihood that a formerly unhoused individual will have difficulty obtaining stable long-term housing. The Knox County Report on Homelessness indicates

that when an individual is experiencing untreated or undiagnosed mental illness, or lacks access to housing specifically for substance misuse, they often struggle to maintain their housing. Being placed in permanent housing while coping with inadequately treated substance misuse or mental health disorders can lead to complex and sometimes unsustainable relationship dynamics in facilities. Adequate availability of mental health services, coupled with stable housing could help ensure stability in housing for this population. Stakeholders reported a need for increased mental health and substance misuse counseling.

During the consultation process, KCDC indicated that the elderly subpopulation could benefit from additional supportive services as they age in place/transition to Medicaid beds. Many privately owned units rented by the elderly are being sold, leaving the elderly at risk of not being able to find subsequent housing. Transportation for the elderly is unreliable and often insufficient, particularly for the physically disabled.

According to 2015-2019 CHAS data, there is a gap of 17,825 affordable units for Knox County. This indicates that the supply of affordable housing units is insufficient for households earning 0-30% AMI and those earning 30-50% AMI. As a result, these households reside in housing units that are more costly than what would be considered affordable to them. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 12,855 rental households in the County considered at risk of homelessness, these additional costs further exacerbate the limited access to affordable housing. The consultation process also confirmed that the supply of affordable options for housing low-income households is insufficient to meet growing needs among the qualifying populations.

The table below shows a detailed breakdown of the CHAS data for rental households:

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	66,930	-	27,195	40.6%	13,420	20.1%
Very Low-Income Renters (0-50% AMI)	30,390	45.4%	21,130	31.6%	12,760	19.1%
30-50% AMI	11,930	17.8%	8,620	12.9%	2,515	3.8%
Extremely Low-Income Renters (0-30% AMI)	18,460	27.6%	12,510	18.7%	10,245	15.3%

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

There were 2,332 (17.6%) individuals with a history of domestic violence and 753 (5.7%) were actively fleeing domestic violence identified by the 2021 HMIS. Of those with a history of domestic violence, 84.4% were households of only adults and 17.4% were households with adults and children. There were two children only households with a history of domestic violence. Additionally, of the 753 who were

fleeing domestic violence, 72.5% were adult only households and 27.2% were households with adults and children. There was one child only household actively fleeing domestic violence.

Transitional housing has been identified as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult. As identified in the 2022 HIC, there are 35 (13.1%) of 268 transitional housing beds for victims of domestic violence, though stakeholders reported a need for more transitional housing. Needs beyond housing include legal assistance, healthcare and counseling.

The Youth Action Board, a group led by youth that is experiencing or has experienced homelessness, reported a significant gap in available resources to help DV victims and many youth that participated in the consultation process indicated that many DV victims are unaware they are in a DV situation until later. Additionally, participants noted that it could be difficult to obtain support as many government programs require the individual to attempt to obtain child support from the abuser. Participants noted that they had avoided applying or were rejected for government programs because of this.

Stakeholders also reported that many of the affordable units available in the county are also in locations where victims are being trafficked, making it difficult to place victims in those units.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Housing stability is critical to housing success; funding for stability services and financial assistance (such as rental and utility arrears) is not widely available, according to stakeholders. In fact, housing stability, prevention and diversion services was the most often cited unmet need during the consultation process, behind affordable housing inventory. Availability of services providing financial literacy, housekeeping/life skills, mental health counseling, transportation, childcare, and rental assistance also contribute to a household's stability, and stakeholders reported needs for all of these.

According to HMIS, during the period of January 1, 2021-December 31, 2021, 5,686 individuals exited the homeless system. Of these, 22.7% exited to temporary destinations, including transitional housing and temporarily staying with friends or family. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 7.8% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely low-, and low-income households.

Veterans: Per HMIS data during the period from January 1, 2021-December 31, 2021, 867 Veterans were homeless. Of those, 399 exited from homelessness 63 (15.8%) to temporary destinations. Continuity of assistance is important, so Veteran households don't regress and have to start over identifying services and housing options. Providing permanent affordable options for Veterans could help address this need. During the 2020 PIT, 12 Veterans were determined to be unsheltered indicating a barrier in accessing these resources or difficulties by service providers in engaging veterans. These barriers may include co-occurring mental health and/or substance abuse disorders, lack of income or rental history, or criminal history. Housing stabilization services, including case management, rental assistance, for Veterans are a need and not available through the VA, as reported by stakeholders. KCDC

is developing 32 units for Veterans and indicated a need for on-site services to promote stability once housed.

Persons with Disabilities: According to HMIS, 2,362 individuals with physical disabilities were homeless. For people with disabilities, housing that is both affordable and accessible is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Medical respite care was identified as a need for individuals discharging from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

Data reported in KnoxHMIS during 2020 shows that 24% of people accessing homeless services cited health as their primary cause of homelessness (substance misuse – 10%, mental health – 10%, and long-term medical condition – 4%). According to the Knox County Report on Homelessness, providers indicated that this represents an underreporting of the number of individuals seeking homeless services with a co-occurring substance misuse and/or mental health disorder. The same report indicates there are very few housing options available with on-site staff trained to support formerly homeless individuals and families who may be struggling with substance misuse and/or mental or physical health disorders. Without access to specialized services, the likelihood of someone struggling with either of these disorders returning to homelessness is high. This trend was also identified during the preparation of the 2020-2024 Consolidated Plan, where stakeholders reported that individuals with mental health diagnoses, substance misuse disorders) that are often unable to maintain housing, even with services. A lack of providers, lack of treatment facilities and insurance coverage not being available for treatment were identified as factors in instability and returns to homelessness. The formerly chronically homeless/chronic substance misusers have highest rates of recidivism and returns to homelessness, pointing to a need for more services for those acclimating to rental/new housing.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

According to Knox County PA 2-1-1 calls from January 1, 2020, through October 31, 2022, the service received over 7,184 contacts. The top request with 3,248 (44.2%) calls was for other utilities. These requests peaked in September of 2020 with 254 calls. A close second, 3,175 (44.2%) of calls were for rental assistance. These requests peaked in August of 2021 with 208 calls. The third category was much smaller at 322 (4.5%) calls and was specifically looking for emergency shelter. These requests peaked in October of 2022 with 22 calls. This suggests an unmet need for supportive services and reinforces stakeholder comments indicating a lack of affordable and accessible housing options.

Since PIT and HIC data only provide a snapshot of persons experiencing homelessness on a single night, a broader picture can be provided through data currently presented in Knox County's Annual Performance Report (APR) for January 1, 2021-December 31, 2021, 5,686 households stayed at least one night in emergency shelter (ES), permanent supportive housing (PSH), permanent housing (PH), rapid re-housing (RRH), or transitional housing (TH) or accessed the Coordinated Entry (CE) system, homelessness prevention (HP), street outreach (SO), or used supportive services.

Exits from the Homelessness System			
	% Exits to Positive Destinations	# of Households Exited to Positive Destinations	Total # of Households Exited
<i>By Household type</i>			
Adult-only Households	26.3%	924	3,511
Households with Children	45.9%	842	1,835
Child-only Households	15.0%	51	339
<i>By Pathway</i>			
ES	43.8%	350	800
HP	0%	0	98
PSH + PH	24.2%	23	95
RRH	77.2%	784	1,015
Supportive Services	14.3%	180	1,258
SO	34.7%	342	986
TH	54%	150	278
CE	0%	0	1,167
All Households	32%	1,817	5,686

Only 43% of households exiting emergency shelters exited to positive housing destinations, suggesting an inadequate supply of permanent housing resources for all household types that entered the shelter system. While households utilizing Rapid Rehousing programs experienced more successful placements in permanent housing, it is unclear if the household receives ongoing support in the way of rental assistance and/or services. This could be a population at risk of returning to the homeless system if insufficient resources are available to these households.

Interviews with persons with lived experience identified assistance with vehicle repairs/maintenance, transportation assistance, housing search/application assistance, health services and resources for the unsheltered population (day centers, public restrooms, shower/laundry facilities, storage facilities) as unmet needs.

Other gaps in services identified during consultation include:

- Case management, financial literacy, housekeeping/life skills, transportation, affordable childcare, mental health, primary healthcare, addiction/recovery supports
- One and two bedroom units are the most in demand
- Low-barrier PSH, including supportive housing for seniors
- Youth-specific housing and services, including parenting youth
- Mobile mental health services coupled with Street Outreach Services
- Services targeted to LGBTQI and POC
- Veteran-specific housing and services, including Veteran-specific shelter
- LEP services

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation

plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Knox County is not establishing other characteristics at this time.

Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, housing stability is critical to housing success; funding for stability services and financial assistance (such as rental and utility arrears) is not widely available, according to stakeholders. In fact, housing stability, prevention and diversion services was the most often cited unmet need during the consultation process, behind affordable housing inventory. Rental housing that is affordable and accessible to individuals and households is also a priority need. The Knox County Report on Homelessness noted a nearly 20% increase in rent prices between July and September 2022. An adequate inventory of deeply subsidized housing for Qualifying Populations is a priority due to landlord barriers and these escalating rental costs.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

In addition to feedback from stakeholders and consultation sessions, the following plans and data sources were consulted to determine needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS) 5-year estimates, 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2015-2019
- Knox County Coalition on Homelessness 2022 Point-In-Time Counts (PIT)
- Knox County Coalition on Homelessness Housing Inventory County (HIC)
- Knox County Coalition on Homelessness Coordinated Entry System (CES)
- Knox County CoC Performance Report (APR)
- 2021 System Performance Measures
- United Way of Tennessee’s 2-1-1 Counts
- Knox County Report on Homelessness 2022
- Knox County 2020-2024 Consolidated Plan

To evaluate the size and demographic composition of qualifying populations within its boundaries, the County enlisted the help of the Knoxville/Knox County CoC to provide data on homelessness and other qualifying populations. The County utilized CHAS, ACS and HIC data to identify the current affordable inventory in the County, as well as to determine the gap in housing availability. HMIS data on the percentage of households exiting the homeless system to unknown or temporary destinations and rates of return to homelessness were also used to determine the availability affordable housing inventory. In addition, the County utilized United Way 2-1-1 data as well as stakeholder feedback to identify service needs for the County.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Knox County Community Development (KCCD) will solicit applications from potential subrecipients. The County’s existing application solicitation methods will be used and will be compliant with HOME, HOME-ARP, and OMB regulations. The proposed activity(ies), including the proposed qualifying population(s) to be served, will be evaluated in accordance with the County’s HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be considered. Service providers or subrecipients applying for HOME-ARP must meet the minimum program eligibility and threshold requirements.

Describe whether the PJ will administer eligible activities directly:

Knox County intends to administer a portion of its HOME-ARP funds directly. Supportive service dollars will be utilized by the County for some services, to include but not be limited to housing location, stabilization and other HOME-ARP eligible supportive services for all of the qualifying populations. Applications may also be solicited from subrecipient service providers and will be done so as described above. The County will execute subrecipient agreements with said agencies. Knox County will also administer the administrative and planning funds directly.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

Knox County will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,322,558		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$0#	0	0
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 233,392.00	15 %	15%
Total HOME ARP Allocation	\$ 1,555,950.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. Knox County will distribute 85% of its HOME-ARP allocation to make HOME-ARP eligible supportive services available for all of the qualifying populations. While an overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders, an equal need for supportive services, including housing navigation and stability services was identified. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients, and housing stability services were identified as way to help keep people housed ensuring stability and success in permanent housing for vulnerable households. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The affordable rental housing inventory in Knox County is inadequate to meet the needs of the population. In addition, shelter resources to meet the needs of all qualifying populations are limited and, in many cases, nonexistent. However, the amount of funding available for creating rental units or shelter space would limit the benefit of the HOME-ARP funding to a very small number QP households. As such, the County will continue to pursue the creation of rental housing through other local resources to meet this priority need, and instead will focus its HOME-ARP resources on providing housing navigation and stabilization services to HOME-ARP qualifying populations. This was a recurring theme identified during consultations, the lack of housing stability services and resources in the County.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Knox County is not proposing the use of HOME-ARP resources for the creation of affordable housing.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Affordable rental housing development is a priority need that will be addressed using other federal, state, and local funds such as HOME, LIHTC, and ARPA. HOME-ARP funding provides the County with a unique opportunity to provide Supportive Services to County residents.

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Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Knox County will not establish a preference; all qualifying populations will be eligible to apply for assistance under the County's HOME-ARP assisted program(s). Any preferences established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No preferences are established.

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Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Knox County may use the Coordinated Entry system (CHAMP) as an indirect referral source. That is, the CHAMP will be used for intake, but will not be used to admit applicants directly to a HOME-ARP assisted project. Referrals from CHAMP and other sources to the services provided by HOME-ARP will be received in chronological order.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be admitted in chronological order.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized to admit qualifying populations to projects.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be admitted in chronological order of application, regardless of referral source.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Knox County is not establishing limitations on eligibility.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Knox County is not establishing limitations on eligibility.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable.

HOME-ARP Refinancing Guidelines

Knox County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds. If the County determines that it will use HOME ARP for refinancing, the guidelines for doing so will be in conformance with the HOME-ARP program notice and will be submitted to HUD for review.

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